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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

JULIE HANNA,  
vs.  
K-KEL, INC.. a Nevada Corporation; et al.,  
Plaintiff,  
Defendants.)  
) Case No.: 2:21-cv-00639-JCM-BNW  
) Stipulation and Order to Extend Deadline for  
) Response and Reply to Defendants Michael  
) York Motions to Dismiss (ECF No. 59)  
) [First Request]  
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Pursuant to Local Rule 6-1, Plaintiff Julie Danou Hanna (“Plaintiff”) and Defendant Michael York (“Defendant”), by and through their undersigned counsel, hereby stipulate to a twenty one (21) day extension of Plaintiff’s deadline to file an Opposition to Defendant Michael York’s Motion to Dismiss (ECF No. 59) and Defendants’ deadline to file a Reply to Plaintiff’s Opposition, as follows:

	Old Deadline	New Deadline
Plaintiff's Opposition Deadline	March 17, 2022	April 7, 2022
Defendant's Reply Deadline	March 24, 2022	April 14, 2022

25 This is the first request for an extension of these deadlines. The requested extension is sought in  
26 good faith and not for purposes of undue delay.

1                   **GOOD CAUSE FOR EXTENSION OF DEADLINES**

2                   This extension is necessitated to accommodate the heavy litigation schedule faced by Plaintiff's  
3                   counsel over the next few weeks. Additionally, the Parties are currently engaged in settlement  
4                   discussions and believe additional time is necessary to fully explore settlement before additional  
5                   attorney's fees are incurred in this litigation.

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11                   Respectfully submitted,

12                   DATED 3/15/2022

13                   \_\_\_\_\_  
14                   /s/ *Kathryn Black*  
15                   Kathryn Black, Esquire  
16                   Pro Hac Vice Admission  
17                   Attorney for Plaintiff  
18

19                   \_\_\_\_\_  
20                   /s/ *Mitchell Bisson*  
21                   Mitchell Bisson, Esquire  
22                   Nevada Bar No. 11920  
23                   Attorney for Defendant  
24

25                   **ORDER**

26                   IT IS SO ORDERED.

27                   \_\_\_\_\_  
28                   *Xenia C. Mahan*  
29                   UNITED STATES DISTRICT JUDGE

30                   Dated: March 17, 2022 \_\_\_\_\_.  
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